

EXHIBIT D

**EASTERN PROFIT CORPORATION LIMITED'S
DEPOSITION DESIGNATIONS**

Lianchao Han
Deposition Transcript
August 28, 2019

| Eastern Designations | | Strategic Objections | Strategic Counter-Designations | | Eastern Objections to Strategic Counter-Designations |
|-----------------------------|---------------|--|---------------------------------------|---------------|--|
| <u>Beginning</u> | <u>Ending</u> | | <u>Beginning</u> | <u>Ending</u> | |
| 9:08 | 11:14 | | | | |
| 30:19 | 30:22 | | | | |
| 32:04 | 32:11 | | | | |
| 32:22 | 33:02 | | | | |
| 33:20 | 34:05 | Objection | | | |
| 34:13 | 34:14 | | | | |
| 34:17 | 34:22 | | | | |
| 35:03 | 35:07 | | | | |
| 35:14 | 35:18 | | | | |
| 38:20 | 39:11 | | | | |
| 39:21 | 40:01 | | | | |
| 40:03 | 40:18 | | | | |
| 40:21 | 41:13 | Objection | | | |
| 41:16 | 42:01 | 41:16-17 were stricken by the questioner | | | In response to Strategic's objection, Eastern amends its designation to as follows: 41:18-42:01 |
| 42:04 | 42:06 | Objection | | | |
| 43:01 | 43:02 | | | | |
| 43:07 | 43:09 | | | | |
| 43:11 | 44:13 | | | | |
| 44:17 | 45:04 | | | | |
| 45:08 | 46:02 | | | | |
| 46:17 | 47:04 | | | | |

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|----------------------|-------|--|--------------------------------|--|--|
| 47:07 | 47:09 | | | | |
| 49:17 | 49:19 | | | | |
| 69:10 | 69:11 | This was effectively stricken by the questioner in lieu of 70:1-3 (which was not designated); however, the witness does not directly answer that question, which sought the witness's perspective regarding the impression given by the asserted fact that Guo Wengui was held and then released by the Chinese government, allowing him to enter the U.S. even though once in Chinese custody. The witness describes the various general powers of the Chinese authorities, not the impression given by their actions in this particular instance. | | | 106 (Should include 70:1-3) |
| 70:06 | 70:08 | (identical to objection for 69:10) This was effectively stricken by the questioner in lieu of 70:1-3 (which was not designated); the witness does not directly answer the question, which sought the witness's perspective regarding the impression given by the asserted fact that Guo Wengui was held and then released by the Chinese government, allowing him to enter the U.S. even though once in Chinese custody. The witness describes the various general powers of the Chinese authorities, not the impression given by their actions in this particular instance. | | | |

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|----------------------|-------|--|--------------------------------|--|--|
| 70:11 | 70:14 | (identical to objection for 69:10) This was effectively stricken by the questioner in lieu of 70:1-3 (which was not designated); the witness does not directly answer the question, which sought the witness's perspective regarding the impression given by the asserted fact that Guo Wengui was held and then released by the Chinese government, allowing him to enter the U.S. even though once in Chinese custody. The witness describes the various general powers of the Chinese authorities, not the impression given by their actions in this particular instance. | | | |
| 71:21 | 72:03 | The witness speculates regarding the motives and availability of business transactions in mainland China; the witness testified that he has been living in the U.S. for decades (9:17-22), his career is not in business transactions like that described here (10:4-11:14), the example was not taking money from China but investing in China; the foundation was not laid for how the witness has a sufficient base of knowledge to address the subject matter; the witness relies on what other, named activists have told him. | | | |

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|----------------------|-------|--|--------------------------------|--|--|
| 72:14 | 73:05 | (identical to objection for 72:14) The witness speculates regarding the motives and availability of business transactions in mainland China; the witness testified that he has been living in the U.S. for decades (9:17-22), his career is not in business transactions like that described here (10:4-11:14), the example was not taking money from China but investing in China; the foundation was not laid for how the witness has a sufficient base of knowledge to address the subject matter; the witness relies on what other, named activists have told him. | | | |
| 73:10 | 73:11 | | | | |
| 73:13 | 73:17 | | | | |
| 73:21 | 73:21 | The testimony is confusing and nonresponsive. The witness testified that it would not surprise him if Guo spoke publicly in support of President Xi and then explains the answer by testifying that, in private, Guo said the opposite, and that testimony goes beyond Xi to the entire Communist Party. | | | |
| 74:01 | 74:08 | (identical to objection for 74:01) The testimony is confusing and nonresponsive. The witness testified that it would not surprise him if Guo spoke publicly in support of President Xi and then explains the answer by testifying that, in private, Guo said the opposite, and that testimony goes beyond Xi to the entire Communist Party. | | | |

| Eastern Designations | | Strategic Objections | Strategic Counter-Designations | | Eastern Objections to Strategic Counter-Designations |
|----------------------|-------|---|--------------------------------|--|--|
| 74:09 | 74:13 | | | | |
| 77:06 | 77:19 | | | | |
| 77:21 | 78:03 | | | | |
| 80:18 | 80:19 | The testimony is based on speculation, as evidenced by the witness's statement "[t]hat's just my understanding..." The witness does not base his answer on any expressed source other than himself, even though the witness purports to describe Guo Wengui's state of mind as having more import than his spoken words ("What he said ... is not what he really intended to say"). What the witness says, in essence, is that Guo misspoke. | | | |
| 80:22 | 81:03 | (identical to objection for 80:18) The testimony is based on speculation, as evidenced by the witness's statement "[t]hat's just my understanding..." The witness does not base his answer on any expressed source other than himself, even though the witness purports to describe Guo Wengui's state of mind as having more import than his spoken words ("What he said ... is not what he really intended to say"). What the witness says, in essence, is that Guo misspoke. | | | |

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|----------------------|--------|---|--------------------------------|--|--|
| 81:06 | 81:12 | (identical to objection for 80:18) The testimony is based on speculation, as evidenced by the witness's statement "[t]hat's just my understanding..." The witness does not base his answer on any expressed source other than himself, even though the witness purports to describe Guo Wengui's state of mind as having more import than his spoken words ("What he said ... is not what he really intended to say"). What the witness says, in essence, is that Guo misspoke. | | | |
| 138:02 | 138:15 | | | | |
| 138:17 | 139:15 | | | | |
| 160:10 | 160:19 | | | | |
| 170:16 | 171:05 | | | | |
| 172:16 | 172:17 | | | | |
| 172:19 | 172:21 | | | | |
| 174:21 | 175:07 | | | | |
| 198:09 | 199:02 | | | | |
| 226:10 | 226:11 | | | | |
| 226:14 | 227:03 | | | | |
| 227:16 | 228:03 | | | | |

| Eastern Designations | | Strategic Objections | Strategic Counter-Designations | | Eastern Objections to Strategic Counter-Designations |
|----------------------|--------|---|--------------------------------|--|--|
| 228:12 | 228:14 | The witness's response indicates confusion about the question and his answer is non-responsive, irrelevant and uninformed. The question relates to the early stage in the project when Eastern Profit (through Yvette Wang) delivered two thumb drives to Strategic Vision that were corrupted by malware. The thumb drives were supposed to identify the subjects of the project but instead were unusable and had to be replaced. Instead of addressing the thumb drives, the witness purports to criticize the later presentation by Strategic Vision of initial work done on the project by Team 1. That was not the subject of the question and is nonresponsive. | | | |
| 228:17 | 229:01 | (identical to objection for 228:12) The witness was confused by the question and his answer is non-responsive, irrelevant and uninformed. The question relates to the early stage in the project when Eastern Profit (through Yvette Wang) delivered two thumb drives to Strategic Vision that were corrupted by malware. The thumb drives were supposed to identify the subjects of the project but instead were unusable and had to be replaced. Instead of addressing the thumb drives, the witness purports to criticize the later presentation by Strategic Vision of initial work done on the project by Team 1. That was not the subject of the question and is nonresponsive. | | | |
| 256:05 | 256:11 | | | | |

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|----------------------|--------|---|--------------------------------|--|--|
| 256:14 | 256:16 | | | | |
| 256:19 | 257:10 | | | | |
| 259:15 | 259:18 | The witness does not answer the question, which asked for a confirmation of the accuracy of the quote by Guo Wengui. Instead of answering the question, the witness provides his opinion about Guo Wengui's overarching intentions regarding China. The witness later admits that he does not have first-hand knowledge of Guo's interactions with the CCP and bases his opinion about that subject not on what Guo has described to him about those interactions but what the witness "observe[s] in social media and based on what my information from the [undefined] other side." Further, the second sentence of the testimony is confusing. | | | |

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|----------------------|--------|---|--------------------------------|--|--|
| 259:21 | 260:05 | (identical to objection for 259:15) The witness does not answer the question, which asked for a confirmation of the accuracy of the quote by Guo Wengui. Instead of answering the question, the witness provides his opinion about Guo Wengui's overarching intentions regarding China. The witness later admits that he does not have first-hand knowledge of Guo's interactions with the CCP and bases his opinion about that subject not on what Guo has described to him about those interactions but what the witness "observe[s] in social media and based on what my information from the [undefined] other side." Further, the second sentence of the testimony is confusing. | | | |
| 260:08 | 260:17 | Speculation. By the witness's own admission ("I speculate..."), the witness is basing his testimony on speculation. The witness also purports to compare "Strategic goal" to Guo Wengui's goal, and the resulting statement is confusing. There is no foundation for the witness to speak to what "goal and objective" Strategic had regarding the project. The witness did not even represent Strategic's interests at any time during the project. The witness also offers broad, unsubstantiated statements like that "everyone hates" Wang Xishan. | | | |

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|----------------------|--------|---|--------------------------------|--|--|
| 260:21 | 261:18 | <p>(identical to objection for 260:08) Speculation. By the witness's own admission ("I speculate he's talking about..."), the witness is basing his testimony on speculation. The witness also purports to compare "Strategic goal" to Guo Wengui's goal, and the resulting statement is confusing. There is no foundation for the witness to speak to what "goal and objective" Strategic had regarding the project. The witness did not even represent Strategic's interests at any time during the project. The witness also offers broad, unsubstantiated statements like that "everyone hates" Wang Xishan.</p> <p>In the second answer designated here, the witness confirms that he does not have first-hand knowledge of Guo's interactions with the CCP, and that he is basing his opinion about that subject not on what Guo has described to him about those interactions but what the witness "observe[s] in social media and based on what my information from the [undefined] other side."</p> <p>In the third designated answer here, the witness bases his testimony on an unnamed group of dissidents from China. This is not a legitimate basis for the testimony and it is objectionable.</p> | | | |

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|----------------------|--------|---|--------------------------------|--|--|
| 263:19 | 263:20 | The indicated testimony is based on speculation and is contrary to the witness's earlier testimony that the CCP has various general powers and uses them in ways that cannot be predicted (70:11-14 ("They can do anything...release you, detain you, put you on a leash. There are so many things they can do.")). In the testimony at issue here, the witness states "[t]hey will definitely jail him and most likely kill him ..." | | | |
| 263:22 | 264:04 | (identical to objection for 263:19) The indicated testimony is based on speculation and is contrary to the witness's earlier testimony that the CCP has various general powers and uses them in ways that cannot be predicted (70:11-14 ("They can do anything...release you, detain you, put you on a leash. There are so many things they can do.")). In the testimony at issue here, the witness states "[t]hey will definitely jail him and most likely kill him ..." | | | |

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|----------------------|--------|--|--------------------------------|--|--|
| 264:06 | 264:21 | <p>(identical to objection for 263:19) The indicated testimony is based on speculation and is contrary to the witness's earlier testimony that the CCP has various general powers and uses them in ways that cannot be predicted (70:11-14 ("They can do anything...release you, detain you, put you on a leash. There are so many things they can do.))) In the testimony at issue here, the witness states "[t]hey will definitely jail him and most likely kill him ..."</p> <p>The second portion here is irrelevant and prejudicial to Strategic. There is nothing improper for Strategic Vision to have offered a finder's fee to the witness for introducing Strategic to Guo but the witness, without a basis, describes the offer in negative terms in that, had he accepted, his reputation would have been "jeopardized." The testimony objectionably places Strategic Vision in a negative light.</p> <p>Withdraw objection to 264:09-264:18</p> | | | |
| 265:01 | 265:20 | Objection | | | |
| 267:11 | 267:16 | | | | |
| 267:18 | 270:02 | | | | |
| 272:08 | 273:10 | | | | |
| 275:15 | 276:22 | | | | |
| 277:02 | 278:05 | | | | |

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|----------------------|--------|---|--------------------------------|--|--|
| 278:08 | 279:17 | (278:10-16) This question was stricken and should not be designated. | | | In response to Strategic's objection, Eastern amends its designation as follows: 278:08-278:09 278:17-279:17 |
| 283:15 | 284:15 | As a disclosed agent of Eastern Profit during contract negotiations, the witness should be treated as a representative of Eastern Profit in the context of this testimony. The examiner asked improper, leading questions of his own witness. | | | |
| 285:03 | 286:14 | | | | |
| 293:10 | 293:22 | The witness's statements were after the record was closed by the examiner. There was no question pending. The gratuitous, paternalistic remarks are not admissible evidence. | | | |

French Wallop
Deposition Transcript
February 12, 2019
(“Wallop I”)

| Eastern Designations | | Strategic Objections | Strategic Counter-Designations | | Eastern Objections to Strategic Counter-Designations |
|----------------------|---------------|--|---|---|--|
| <u>Beginning</u> | <u>Ending</u> | | <u>Beginning</u> | <u>Ending</u> | |
| 09:01 | 09:04 | | | | |
| 11:12 | 12:21 | | | | |
| 16:16 | 18:12 | 18:10-12: cumulative. The witness answered in a more complete fashion above this segment, and this segment is unnecessarily duplicative. | 19:10 21:1 24:1 29:6 29:14 29:17 | 20:23 23:14 24:3 29:13 29:15 29:19 | 106 (Must include 29:22 to answer question at 29:18-19). |
| 21:01 | 23:06 | | | | |
| 26:21 | 29:13 | 27:24-28:5 does not contain relevant information. The witness does not recall whether or not she gave her LinkedIn profile to Yvette Wang or Guo Wengui, and the witness does not know whether those representatives of Eastern Profit otherwise had it. | 61:14 | 61:19 | 106 (should include 61:20-23) |

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| 59:02 | 61:13 | <p>59:17-60:5: The testimony is not relevant, and the witness did not answer the question as posed, which the examiner notes in saying “I didn’t ask you about that at all.” The witness then places her testimony in the context of a conversation without describing the context, time, or full content of the conversation.</p> <p>60:21-61:1: this portion was designated by Strategic in error. Strategic objects to citation of the testimony because it is vague and confusing. The witness has testified that Strategic Vision believed the fruits of the research agreement would be used against the communist party, not that the results would be used for an unknown purpose described as “both ways.”</p> | | | |
| 73:10 | 73:13 | | | | |
| 90:04 | 91:01 | | | | |
| 108:05 | 109:18 | | 110:25 | 111:8 | |
| 126:03 | 126:16 | | | | |
| 136:13 | 137:07 | | 52:25 135:11 89:6 | 53:25 135:24 89:22 | 402/403 (as to 89:6-89:22) |
| 137:09 | 137:15 | | | | |
| 151:22 | 152:13 | | | | |
| 186:13 | 186:20 | | | | |
| 192:07 | 194:16 | | | | |
| 290:25 | 291:22 | 291:12-22: Irrelevant, immaterial to the claims as pled by Eastern Profit, without foundation, prejudicial | | | |

French Wallop
Deposition Transcript
November 19, 2019
(“Wallop II”)

| Eastern Designations | | Strategic Objections | Strategic Counter-Designations | | Eastern Objections to Strategic Counter-Designations |
|-----------------------------|---------------|-----------------------------|---------------------------------------|-----------------------|---|
| <u>Beginning</u> | <u>Ending</u> | | <u>Beginning</u> | <u>Ending</u> | |
| 35:05 | 36:05 | | 36:6 39:4 | 38:21 39:8 | 402/403 |
| 43:08 | 44:12 | | 44:13 | 44:23 | |
| 47:06 | 47:11 | | 47:12 50:5 50:12 | 49:6 50:7 50:17 | 106 (Should also include 49:07-50:04) |
| 51:03 | 54:25 | | 55:12 | 58:16 | |

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|-------|-------|---|--|--|--|
| 77:08 | 86:08 | <p>81:9-82:5: the witness stated that she mistakenly indicated the Hermes expenditure was a business expense related to the funds received on the Research Agreement and that she had correctly noted it not being a business expense on a document not being used as an exhibit at the deposition. This testimony was based on a mistaken entry that the witness disavowed, and it should be stricken.</p> <p>83:17-85:6: the testimony is unfairly prejudicial in portraying French Wallop as having misused funds in connection with the Research Agreement. Eastern Profit did not place any parameters, orally or in writing, on how funds under the Agreement were to be spent.</p> | | | |
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|-------|-------|---|-------|------|----------|
| 87:25 | 93:17 | <p>Citation to the indicated testimony is improper because it is without regard to the stipulation Strategic placed on the record moments later at 94:24-96:8. That stipulation indicated that Strategic was not seeking recovery for any expenditures of funds by Strategic, French Wallop, or Mike Waller after March 25, 2018. Eastern Profit did not reject the stipulation on the record and has not rejected the stipulation at any time after the deposition. Nevertheless, Eastern Profit has included testimony regarding expenditures after March 25, 2018. The testimony is withdrawn by the effect of the stipulation and is otherwise objectionable as prejudicial and inflammatory to Strategic Vision.</p> | 94:24 | 96:8 | C/O; 402 |
|-------|-------|---|-------|------|----------|

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|-------|-------|--|-------|------|----------|
| 96:11 | 96:13 | (identical to objection for 87:25) Citation to the indicated testimony is improper because it is without regard to the stipulation Strategic placed on the record moments later at 94:24-96:8. That stipulation indicated that Strategic was not seeking recovery for any expenditures of funds by Strategic, French Wallop, or Mike Waller after March 25, 2018. Eastern Profit did not reject the stipulation on the record and has not rejected the stipulation at any time after the deposition. Nevertheless, Eastern Profit has included testimony regarding expenditures after March 25, 2018. The testimony is withdrawn by the effect of the stipulation and is otherwise objectionable as prejudicial and inflammatory to Strategic Vision. | 94:24 | 96:8 | C/O; 402 |
|-------|-------|--|-------|------|----------|

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|-------|--------|--|------|------|----------|
| 96:20 | 101:15 | (identical to objection for 87:25) Citation to the indicated testimony is improper because it is without regard to the stipulation Strategic placed on the record moments later at 94:24-96:8. That stipulation indicated that Strategic was not seeking recovery for any expenditures of funds by Strategic, French Wallop, or Mike Waller after March 25, 2018. Eastern Profit did not reject the stipulation on the record and has not rejected the stipulation at any time after the deposition. Nevertheless, Eastern Profit has included testimony regarding expenditures after March 25, 2018. The testimony is withdrawn by the effect of the stipulation and is otherwise objectionable as prejudicial and inflammatory to Strategic Vision. | 96:8 | 96:8 | C/O; 402 |
|-------|--------|--|------|------|----------|

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|--------|--------|---|------|------|----------|
| 103:11 | 105:16 | <p>identical to objection for 87:25) Citation to the indicated testimony is improper because it is without regard to the stipulation Strategic placed on the record moments later at 94:24-96:8. That stipulation indicated that Strategic was not seeking recovery for any expenditures of funds by Strategic, French Wallop, or Mike Waller after March 25, 2018. Eastern Profit did not reject the stipulation on the record and has not rejected the stipulation at any time after the deposition. Nevertheless, Eastern Profit has included testimony regarding expenditures after March 25, 2018. The testimony is withdrawn by the effect of the stipulation and is otherwise objectionable as prejudicial and inflammatory to Strategic Vision.</p> | 96:8 | 96:8 | C/O; 402 |
|--------|--------|---|------|------|----------|

J. Michael Waller
Deposition Transcript
February 8, 2019
(“Waller I”)

| Eastern Designations | | Strategic Objections | Strategic Counter-Designations | | Eastern Objections to Strategic Counter-Designations |
|----------------------|---------------|---|--------------------------------|--------------------------------|---|
| <u>Beginning</u> | <u>Ending</u> | | <u>Beginning</u> | <u>Ending</u> | |
| 10:23 | 11:01 | | 11:2 12:19 | 11:25 14:20 | 106 (Must include 14:21-22). |
| 15:24 | 16:07 | | 16:23 28:3 | 17:20 28:12 | |
| 28:16 | 29:03 | | 24:10 30:3 33:8 34:5 | 25:13 30:24 34:3 35:1 | |
| 29:10 | 30:02 | | 24:10 | 25:13 | |
| 35:02 | 35:04 | | 36:20 38:08 19:22 | 38:6 38:14 19:25 | |
| 35:19 | 36:19 | | 36:20 19:22 | 38:14 19:25 | |
| 157:09 | 157:22 | | 157:23 | 160:1 | |
| 189:01 | 189:10 | | 24:10 | 25:13 | |
| 286:01 | 287:08 | 286:6-7 was stricken by the examiner and should not be cited. The cited portion also contains commentary between counsel and reference to pleadings (286:18-23) that will be confusing to the jury and should not be read. The witness does not address the question, and 286:8-14 should not be cited. | | | In response to Strategic’s objections, Eastern amends this designation to the following: 286:01-286:05 286:08-286:17 287:05-287:11 |

J. Michael Waller
 Deposition Transcript
 November 19, 2019
 (“Waller II”)

| Eastern Designations | | Strategic Objections | Strategic Counter-Designations | | Eastern Objections to Strategic Counter-Designations |
|-----------------------------|---------------|--|---------------------------------------|----------------|---|
| <u>Beginning</u> | <u>Ending</u> | | <u>Beginning</u> | <u>Ending</u> | |
| 6:02 | 7:20 | Except for 7:5-7 and 7:8-20, irrelevant, confusing to the jury, falsely implying that the witness needed a written authorization to be capable of giving the testimony | | | |
| 11:14 | 11:23 | | | | |
| 30:16 | 30:18 | The question (30:16-18) is designated but the answer is not and should be. | 30:23 | 31:4 | |
| 30:22 | 31:07 | | 37:2 49:3 | 38:19 50:23 | 402/403; 801/802 |
| 31:09 | 36:25 | | 37:2 49:3 | 38:19 50:23 | 402/403; 801/802 |
| 52:03 | 52:20 | | 52:21 | 54:10 | |

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|--------|--------|--|--|--|--|
| 55:25 | 57:16 | The cited testimony is incomplete in that the witness indicated he could not fully answer the questions without reviewing another document that was not introduced by the examiner (“I can’t accurately tell you who is who...”). Citing the testimony is unfair and prejudicial because it admittedly caused the witness “sitting here just based on looking at their names” to speculate. There is no probative value to the testimony because Eastern Profit, not Strategic Vision, chose the subjects of research. The Agreement did not give Strategic Vision a right to reject any subjects. | | | |
| 66:10 | 69:04 | 66:20-67:9: the witness indicates he has not been designated by Strategic Vision to discuss the expenditure of funds under the Research Agreement in the context here. | | | |
| 89:21 | 92:03 | 91:23-92:3 calls for a legal conclusion, and the witness was not designated to interpret the provisions of the Research Agreement. At most, this is personal testimony from the witness as to a legal conclusion. | | | |
| 93:04 | 93:10 | | | | |
| 93:12 | 94:06 | | | | |
| 96:05 | 96:09 | | | | |
| 97:12 | 101:12 | | | | |
| 101:16 | 103:25 | | | | |
| 105:03 | 111:20 | | | | |
| 112:07 | 115:14 | | | | |
| 115:19 | 116:17 | | | | |

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|--------|--------|--|--|--|--|
| 174:17 | 176:25 | | | | |
| 177:07 | 184:12 | 182:22-183:5 & 184:7-12: the witness was not designated as the spokesperson to testify about the expenditures by Strategic Vision of funds generated by the Research Agreement, his testimony is not binding on Strategic Vision and it should not be cited. | | | |

William Gertz
Deposition Transcript
October 15, 2019

| Eastern Designations | | Strategic Objections | Strategic Counter-Designations | | Eastern Objections to Strategic Counter-Designations |
|-----------------------------|---------------|-----------------------------|---------------------------------------|---------------|---|
| <u>Beginning</u> | <u>Ending</u> | | <u>Beginning</u> | <u>Ending</u> | |
| 17:02 | 21:10 | | | | |
| 69:03 | 69:10 | | | | |
| 69:12 | 69:19 | | | | |
| 69:21 | 71:08 | | | | |
| 74:13 | 76:02 | | | | |
| 79:10 | 79:19 | Objection | | | |
| 83:18 | 85:18 | | | | |
| 100:20 | 102:02 | | | | |
| 182:15 | 183:02 | | | | |
| 183:04 | 183:19 | | | | |